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12 Attorneys for Plaintiff  
 13 ULRICH BOCKELMANN

14  
 15 UNITED STATES DISTRICT COURT  
 16 SOUTHERN DISTRICT OF CALIFORNIA

17  
 18 ULRICH BOCKELMANN, an  
 individual,  
 19  
 20 Plaintiff,

21 v.

22  
 23 THERMO FISHER SCIENTIFIC, INC., a  
 California Corporation; LIFE  
 24 TECHNOLOGIES CORPORATION, a  
 California Corporation; and DOES 1  
 25 through 10,  
 26  
 27 Defendants.

Case No.: **'23CV2161 AGS BLM**

**COMPLAINT FOR PATENT  
 INFRINGEMENT**

**[JURY TRIAL DEMANDED]**

1 Plaintiff Ulrich Bockelmann alleges as follows for its Complaint against  
2 defendants Thermo Fisher Scientific, Inc. and Life Technologies Corporation.

3 **THE NATURE OF THIS ACTION**

4 1. Plaintiff brings this action against Thermo Fisher and Life Technologies  
5 pursuant to 35 U.S.C. §101 et. seq. and §§ 271, 281, 283, 284, & 285 inclusive, for  
6 infringement of one or more claims of U.S. Patent No. 7,993,825 (“the '825 Patent”)  
7 titled “Detection of Molecular Probes Fixed to an Active Zone of a Sensor” and U.S.  
8 Patent No. 7,908,088 (the '088 Patent) titled “Method for Electronically Detecting at  
9 Least One Specific Interaction Between Probe Molecules and Target Biomolecules.” The  
10 '825 and '088 patents protect the inventions of Plaintiff in the area of DNA detection.  
11 Defendants have been made aware of the Patents-in-Suit but have continued to infringe  
12 and have refused to cease its infringing actions, thereby necessitating this lawsuit.

13 **THE PARTIES**

14 2. Plaintiff Ulrich Bockelmann is a German Citizen living in France. Mr.  
15 Bockelmann was one of the named inventors of the Patent-in-Suit and is the current sole  
16 owner of both patents by assignment.

17 3. Defendant Thermo Fisher Scientific, Inc. is the parent company of  
18 Defendant Life Technologies Corporation. Defendants manufacture accused machines  
19 designed to practice the claimed method.  
20

21 4. Defendant Life Technologies Corporation is the successor company to Ion  
22 Torrent, which developed the accused machines designed to practice the claimed method.

23 5. Defendants, and customers of Defendants, practice the claimed methods of  
24 the asserted patents in suit.

25 **JURISDICTION AND VENUE**

26 6. This is an action for patent infringement arising under the laws of the United  
27 States, 35 U.S.C. §271 et seq.  
28



1 patent-in-suit was filed on July 4, 2003, issued on March 15, 2011 and expires on January  
2 5, 2027. Copies of the patents-in-suit are attached to the Complaint as exhibits.

3 12. In 2014, Ulrich Bockelmann formed Ulifetec SAS to commercialize the  
4 technology for use in DNA diagnostics. Mr. Brockelmann and his company developed  
5 prototypes and lab level machines for implementation of the patented methods. Ulifetec  
6 ran laboratory demonstrations, built and tested prototypes, attended conferences and  
7 workshops and presented papers.

8 13. Ion Torrent technical staff and many executives of Ion Torrent and Life  
9 technologies and Therm Fisher attended and presented at the same conferences as Mr.  
10 Bockelmann and Ulifetec.

### 11 **THE PATENTS**

12 14. The '825 patent is directed to a method for detection of a parameter of a  
13 molecular probe, and contains eighteen claims protecting the invention, Claim one is as  
14 follows:  
15

- 16 1. A method for detecting at least one parameter representative of molecular  
17 probes fixed to active zones of a sensor, wherein said sensor includes a network  
18 of field- effect transistors, each of which has a source region, a drain region, and  
19 a gate region which forms one of said active zones on which said representative  
20 parameter is detected, the method comprising the following steps:  
21 a) bringing some of said active zones into contact with molecular probes  
22 in order to fix said probes;  
23 b) bathing at least some of said active zones which have been brought  
24 into contact with said molecular probes, in an electrolyte solution;  
25 c) measuring at least one point of at least one of a drain current, source-  
26 gate voltage, and source-drain voltage characteristic of at least two of the  
27 field- effect transistors having at least two active zones that are part of said  
28 some of active zones, corresponding to a first group, so as to deduce

1 therefrom said representative parameter by comparison between at least two  
2 measurements obtained for two different active zones immersed in said  
3 electrolyte solution; and fixing a potential of the electrolyte solution which  
4 covers said active zones with an electrode that applies a gate source voltage  
5 to the field effect transistors, the electrode being immersed in said  
6 electrolyte solution.

7 15. The '088 patent is directed to a method for detection of an interaction  
8 between a molecular probe and target biomolecules, and contains eighteen claims  
9 protecting the invention, Claim one is as follows:  
10

11 1. A method for electronically detecting at least one specific interaction between  
12 probe molecules fixed to at least one active zone of a sensor and target  
13 biomolecules, wherein said sensor comprises an array of field-effect transistors,  
14 each of which has a source region, a drain region, and a gate region which  
15 constitutes an active zone on which said specific interaction is to be detected, and  
16 wherein said method comprises:

- 17 a) contacting at least one active zone with a probe molecule of a given  
18 type fixed to said active zone,  
19 b) contacting at least some of the probe molecules with target  
20 biomolecules capable of interacting with said probe molecules in a reaction  
21 buffer having a first salt concentration,  
22 c) measuring at least one point of a drain current, a source gate voltage,  
23 or a source-drain voltage characteristic of at least one transistor of said array  
24 to detect said specific interaction at least for a measurement point obtained  
25 in a measuring buffer having a second salt concentration that is lower than  
26 the first concentration for probe molecules having been subjected to said  
27 specific interaction, said measurement being conducted spatially by means  
28 of a difference between said measurement point and a reference point, in

1 said measuring buffer, for two groups of probe molecules fixed to distinct  
2 active zones, the measuring point being obtained for probe molecules having  
3 been subjected to the interaction of step b) and the reference point being  
4 obtained for probe molecules not having been subjected to the interaction of  
5 step b).

## 6 INFRINGEMENT

7 16. Defendants Thermo Fisher and its subsidiary Life Technologies, the  
8 successor to Ion Torrent, manufacture and sell DNA sequencing equipment referred to  
9 generally as “Ion Torrent Technology.” The Ion Torrent Technology from Thermo Fisher  
10 Scientific “takes a unique approach to next-generation sequencing (NGS).” The accused  
11 products from Defendants include: “Ion GeneStudio” systems, “Ion GeneStudios S5”  
12 systems, “Ion S5” systems, the “Ion Torrent Personal Genome Machine (PGM)” “Ion  
13 Chef” systems, “Genexus” systems, Ion Chips, “Ion 530” and “Ion 540” chips, “Ion  
14 Torrent Ion CarrierSeq ECS Kits,” “Ion Code Barcode Adaptors.”  
15

16 17. Defendants’ products alone and in combinations, infringe the '882 and '088  
17 Patents-in-Suit.

18 18. Defendants were placed on notice of the '088 and '825 Patents in 2023.

19 19. Plaintiff has conducted a detailed analysis, establishing and confirming that  
20 the methods performed when using Defendants products according to Defendants'  
21 instructions for operation, infringe claims of the '825 and '088 Patents.

22 20. Attached as an Exhibit to the Complaint is claim chart demonstrating the  
23 correspondence of the operation of the accused products with elements of claims of the  
24 '088 and '825 patents.

25 21. Plaintiff has attempted to engage in discussions with Defendants but  
26 Defendants have declined further discussion.

27 22. Defendants and their customers have continued infringement.  
28

1           23. The accused products listed above are used to perform methods for detecting  
2 molecular probes fixed to an active zone of a sensor, the devices are specifically sold for  
3 DNA sequencing: "First, extract and purify the DNA and/or RNA, depending on the  
4 assay. Using PCR, amplify regions of interest to generate an amplicon sequencing  
5 library." "the library is settled onto a solid substrate and further amplified. For Ion  
6 Torrent™ technology, the substrate is a semi-conductor microchip [active zones] that  
7 enables the sequence of each amplicon in the library to be read independently." The solid  
8 state substrate used by Defendants is a network of field-effect transistors, each of which  
9 has a source region, a drain region, and a gate region forming active zones, "The ion chip  
10 contains ion-sensitive, field-effect transistor-based sensors in perfect register with 1.2  
11 million wells, which provide confinement . . . our proprietary sensors . . . beneath the  
12 well measure the change in pH and convert it to voltage." " A CMOS integrated circuit  
13 for sequencing We have developed a simple, scalable ISFET sensor architecture using  
14 electronic addressing common in modern CMOS imagers (Supplementary Fig. 2). Our  
15 integrated circuit consists of a large array of sensor elements, each with a single floating  
16 gate connected to an underlying ISFET (Fig. 1a). For sequence confinement we rely on a  
17 3.5-mm-diameter well formed by adding a 3-mm-thick dielectric layer over the  
18 electronics and etching to the sensor plate (Fig. 1b)." In use, to a) contact the active zones  
19 with molecular probes; the amplicons are dropped into wells "These beads then flow  
20 across the chip, each depositing into a well (Figure 2.1)." The b) active zones are bathed  
21 in an electrolyte solution; "The Ion Torrent™ next-generation sequencer then  
22 sequentially floods the chip with nucleotides to initiate base calling." Then, c) a  
23 current/voltage characteristic of at least two active zones is measured to deduce a  
24 representative parameter by comparison between at least two measurements obtained for  
25 two different active zones; and ". . . If a nucleotide is added to a DNA template and is  
26 then incorporated into a strand of DNA, a hydrogen ion will be released. The charge from  
27 that ion will change the pH of the solution in the well. Our proprietary ion sensors  
28

1 beneath the well measure the change in pH and convert it to voltage. In essence, each  
2 well works as the world's smallest pH meter." . . . "Figure S11 Physical model a, The  
3 physical model of the well relates the measured signal in wells containing beads (S<sub>b</sub>) and  
4 empty wells (S<sub>e</sub>) to the flux of protons between those wells and the bulk fluid as well as  
5 the flux of protons generated by the incorporation reaction in the bead-containing wells."  
6 The field effect transistors used by Defendants rely on an electrode to fix a potential of  
7 the electrolyte solution, that applies a gate source voltage to the field effect transistors.  
8 "The pH-ISFET sensor system consists of a reference electrode and an ISFET device,  
9 where the reference electrode provides a constant reference potential for the solution. The  
10 structure and working principle of a pH-ISFET sensor system are shown in Figure 1a. In  
11 the solution, the reference electrode provides a constant reference potential, and a change  
12 in the pH value will cause a change in the potential at the interface of the sensitive film."

13  
14 With reference to the claims of the '088 patent, the Ion Torrent devices can be  
15 utilized for sequencing and hybridization, for microbes, transcriptomes, gene panels,  
16 exomes, for specific DNA identification procedures and processes by changing chips,  
17 sequencing buffers, reagents, flushing solutions and nucleotides. The Ion Torrent  
18 equipment is capable of contacting probe molecules with target biomolecules in a  
19 reaction buffer having a first salt concentration, and measuring a current/voltage  
20 characteristic to detect a specific interaction in a measuring buffer having a lower salt  
21 concentration for probe molecules having been subjected to a specific interaction. The  
22 Ion Torrent devices conduct the measurement by means of a difference between a  
23 measurement point and a reference point, in said measuring buffer, for two groups of  
24 probe molecules in active zones, comparing probe molecules subjected to the interaction  
25 and probe molecules not having been subjected to the interaction as a reference point.

26 24. Plaintiff is the owner of the '825 and '088 Patents-in-Suit.

27 25. Defendants have infringed, and continues to infringe, at least claims 1 - 18  
28 of the '825 Patent and claims 1- 17 of the '088, under 35 U.S.C. § 271(a)(b)(c) and (g), by



1 performing the claimed methods in the United States, by inducing others to perform the  
2 claimed methods in the United States, by contributing to the infringement of others and  
3 by selling the product of the patented process. Defendants continue to manufacture  
4 products used to infringe, continue to sell such equipment inducing and contributing to  
5 infringement by others and also continue to perform infringing activity by performing the  
6 claimed method in performing gene sequencing in the United States and by continuing to  
7 sell the product of the patented process in the United States, which activity infringes  
8 claims of the '825 Patent.

9  
10 26. The asserted patents are infringed under 35 USC 271(a) when a claimed  
11 method is "used" by one or more Defendants to detect molecular probes; the asserted  
12 patents are infringed under 271(b) when one or more of the Defendants "induce" others to  
13 practice the claimed method; the asserted patents are infringed under 271(c) when one or  
14 more of the Defendants provides "apparatus [systems / machines / software / hardware /  
15 reagents / solutions, etc.] for use by others in practicing the "patented process," the  
16 asserted patents are infringed under 271(g) when one or more of the Defendants "without  
17 authority . . . offers to sell, sells, or uses within the United States a product [report,  
18 sequencing, analysis, etc.] which is made by the process patented in the United States."

19 27. Upon information and belief, Defendants have directly infringed one or  
20 more of claims of the '825 and '088 patents under 35 USC §271(a):

21 "(a) Except as otherwise provided in this title, whoever without authority makes,  
22 uses, offers to sell, or sells any patented invention, within the United States or  
23 imports into the United States any patented invention during the term of the patent  
24 therefor, infringes the patent"

25 by engaging in accused activity which by practicing the claimed method, by  
26 performing the recited steps of the claimed method in the United States. Defendants  
27 continue to manufacture products used to infringe and continue to perform infringing  
28 activity by performing the claimed method in performing gene sequencing in the United

1 States which infringe claims of the '825 and '088 Patents, including by using the above  
2 described Ion Torrent products.

3 28. Upon information and belief, Defendants have indirectly infringed one or  
4 more of the claims of the '825 and '088 patents under 35 USC §271(b):

5 “(b) Whoever actively induces infringement of a patent shall be liable as an  
6 infringer”

7 by providing accused products, including the Ion Torrent products with  
8 instructions, which are used to practice the patented methods according to the instructions  
9 and thereby inducing others to use the products in an infringing manner.”

10 29. Upon information and belief, Defendants have indirectly infringed one or  
11 more of the claims of the '825 and '088 patents under 35 USC §271(c):

12 (c) Whoever offers to sell or sells within the United States or imports into the  
13 United States . . . or apparatus for use in practicing a patented process, constituting  
14 a material part of the invention, knowing the same to be especially made or  
15 especially adapted for use in an infringement of such patent, and not a staple article  
16 or commodity of commerce suitable for substantial noninfringing use, shall be  
17 liable as a contributory infringer”

18 by providing accused products, including the Ion Torrent products, and other  
19 components and supplies used in gene sequencing, which are used in practicing a  
20 patented process and which are used to practice methods which infringe the claims of the  
21 '825 and '088 patents, thus contributing to the infringement of the '825 and '088 patents.

22 30. Upon information and belief, Defendants have directly infringed one or  
23 more of the claims of the '825 and '088 patents under 35 USC §271(g):

24 “(g) Whoever without authority imports into the United States or offers to sell,  
25 sells, or uses within the United States a product which is made by a process  
26 patented in the United States shall be liable as an infringer, if the importation, offer  
27 to sell, sale, or use of the product occurs during the term of such process patent”  
28

1 by providing products, such as reports, sequencing, analysis, etc. that are the  
2 product of the patented process which infringes the claims of the '825 and '088 patents.

3 31. Defendants do not have a license or authority to use the '825 or the '088  
4 Patent.

5 32. Defendants have been willfully infringing the '825 and '088 Patents since at  
6 least as early as they became aware of the work of Brocelmann and Ulifetec and the '825  
7 and '088 Patents. Upon information and belief, Defendants have no good faith defense to  
8 Plaintiff's infringement allegations and have refused to cease selling products or to  
9 engage in further attempts to reach a business resolution. Instead, Defendants have  
10 intentionally continued their knowing infringement.

11 33. As a result of Defendants' infringement of the '825 and '088 Patents, Plaintiff  
12 has suffered and will continue to suffer damages in an amount not yet determined, of at  
13 least a reasonable royalty.  
14

15 **CLAIM 1**

16 **LIFE TECHNOLOGIES CORPORATION INFRINGEMENT OF U.S. PATENT**  
17 **NO. 7,993,825**

18 34. The allegations of each of the paragraphs above are hereby re-alleged and  
19 incorporated herein by reference.

20 35. Defendant Life Technologies Corporation has infringed, and continues to  
21 directly infringe, at least claims 1 - 18 of the '825 Patent, under 35 U.S.C. § 271(a), by  
22 using the Accused Ion Torrent products in the United States to practice the claimed  
23 method.

24 36. Upon information and belief, Defendant Life Technologies has indirectly  
25 infringed one or more of the claims of the '825 patent under 35 USC §271(b) by  
26 providing accused products, including the Ion Torrent products with instructions, which  
27 are used to practice the patented methods according to the instructions and thereby  
28 inducing others to use the products in an infringing manner.



1 are used to practice the patented methods according to the instructions and thereby  
2 inducing others to use the products in an infringing manner.

3 44. Upon information and belief, Defendant Life Technologies has indirectly  
4 infringed one or more of the claims of the '088 patent under 35 USC §271(c) by  
5 providing accused products, including the Ion Torrent products, and other components  
6 and supplies used in gene sequencing, which are used in practicing a patented process  
7 and which are used to practice methods which infringe the claims of the '088 patent, thus  
8 contributing to the infringement of the '825 patent.

9 45. Upon information and belief, Defendant Life Technologies has directly  
10 infringed one or more of the claims of the '088 patent under 35 USC §271(g) by  
11 providing products, such as reports, sequencing, analysis, etc. that are the product of the  
12 patented process which infringes the claims of the '088 patent.

13 46. Life Technologies does not have a license or authority to use the '088 Patent.

14 47. As a result of Life Technologies' infringement of the '088 Patent, Plaintiff  
15 has suffered and will continue to suffer damages in an amount not yet determined, of at  
16 least a reasonable royalty.

17  
18 **CLAIM 3**

19 **THERMO FISHER SCIENTIFIC INC INFRINGEMENT OF U.S. PATENT NO.**  
20 **7,993,825**

21 48. The allegations of each of the paragraphs above are hereby re-alleged and  
22 incorporated herein by reference.

23 49. Defendant Thermo Fisher has infringed, and continues to directly infringe, at  
24 least claims 1 - 18 of the '825 Patent, under 35 U.S.C. § 271(a), by using the Accused Ion  
25 Torrent products in the United States to practice the claimed method.

26 50. Upon information and belief, Defendant Thermo Fisher has indirectly  
27 infringed one or more of the claims of the '825 patent under 35 USC §271(b) by  
28 providing accused products, including the Ion Torrent products with instructions, which

1 are used to practice the patented methods according to the instructions and thereby  
2 inducing others to use the products in an infringing manner.

3 51. Upon information and belief, Defendant Thermo Fisher has indirectly  
4 infringed one or more of the claims of the '825 patent under 35 USC §271(c) by  
5 providing accused products, including the Ion Torrent products, and other components  
6 and supplies used in gene sequencing, which are used in practicing a patented process  
7 and which are used to practice methods which infringe the claims of the '825 patent, thus  
8 contributing to the infringement of the '825 patent.

9 52. Upon information and belief, Defendant Thermo Fisher has directly  
10 infringed one or more of the claims of the '825 patent under 35 USC §271(g) by  
11 providing products, such as reports, sequencing, analysis, etc. that are the product of the  
12 patented process which infringes the claims of the '825 patent.

13 53. Thermo Fisher does not have a license or authority to use the '825 Patent.

14 54. As a result of Thermo Fishers' infringement of the '825 Patent, Plaintiff has  
15 suffered and will continue to suffer damages in an amount not yet determined, of at least  
16 a reasonable royalty.  
17

18 **CLAIM 4**

19 **THERMO FISHER SCIENTIFIC INC INFRINGEMENT OF U.S. PATENT NO.**  
20 **7,908,088**

21 55. The allegations of each of the paragraphs above are hereby re-alleged and  
22 incorporated herein by reference.

23 56. Defendant Thermo Fisher has infringed, and continues to directly infringe, at  
24 least claims 1 - 17 of the '088 Patent, under 35 U.S.C. § 271(a), by using the Accused Ion  
25 Torrent products in the United States to practice the claimed method.

26 57. Upon information and belief, Defendant Thermo Fisher has indirectly  
27 infringed one or more of the claims of the '088 patent under 35 USC §271(b) by  
28 providing accused products, including the Ion Torrent products with instructions, which

1 are used to practice the patented methods according to the instructions and thereby  
2 inducing others to use the products in an infringing manner.

3 58. Upon information and belief, Defendant Thermo Fisher has indirectly  
4 infringed one or more of the claims of the '088 patent under 35 USC §271(c) by  
5 providing accused products, including the Ion Torrent products, and other components  
6 and supplies used in gene sequencing, which are used in practicing a patented process  
7 and which are used to practice methods which infringe the claims of the '088 patent, thus  
8 contributing to the infringement of the '825 patent.

9 59. Upon information and belief, Defendant Thermo Fisher has directly  
10 infringed one or more of the claims of the '088 patent under 35 USC §271(g) by  
11 providing products, such as reports, sequencing, analysis, etc. that are the product of the  
12 patented process which infringes the claims of the '088 patent.

13 60. Thermo Fisher does not have a license or authority to use the '088 Patent.

14 61. As a result of Thermo Fisher's infringement of the '088 Patent, Plaintiff has  
15 suffered and will continue to suffer damages in an amount not yet determined, of at least  
16 a reasonable royalty.  
17

18 **PRAYER FOR RELIEF**

19 A. For a judgment declaring that Life Technologies has infringed the '825  
20 Patent;

21 B. For a judgment declaring that Life Technologies' infringement of the '825  
22 Patent has been willful;

23 C. For a judgment declaring that Life Technologies has infringed the '088  
24 Patent;

25 D. For a judgment declaring that Life Technologies' infringement of the '088  
26 Patent has been willful;

27 E. For a judgment declaring that Thermo Fisher has infringed the '825 Patent;  
28

1 F. For a judgment declaring that Thermo Fisher’s infringement of the '825  
2 Patent has been willful;

3 G. For a judgment declaring that Thermo Fisher has infringed the '088 Patent;

4 H. For a judgment declaring that Thermo Fisher’s infringement of the '088  
5 Patent has been willful;

6 I. For a grant of a permanent injunction pursuant to 35 U.S.C. §283, enjoining  
7 each of the Defendants from further acts of infringement;

8 J. For a judgment awarding Plaintiff compensatory damages as a result of  
9 each Defendants' infringement sufficient to reasonably and entirely compensate Plaintiff  
10 for infringement of the '825 and '088 Patents in an amount to be determined at trial;

11 K. For a judgment declaring that Defendants' infringement was willful and for  
12 enhancement of damages in accordance with 35 U.S.C. 284;

13 L. For a judgment declaring that this case is exceptional and awarding Plaintiff  
14 its expenses, costs and attorneys’ fees in accordance with 35 U.S.C. § 285 and Rule 54(d)  
15 of the Federal Rules of Civil Procedure;

16 M. For a judgment awarding Plaintiff prejudgment interest pursuant to 35  
17 U.S.C. § 284, and a further award of post judgment interest, pursuant to 28 U.S.C. §  
18 1961, continuing until such judgment is paid;

19 N. For a judgment awarding Plaintiff enhanced damages under 35 U.S.C. §  
20 284; and

21 O. For such other relief to which Plaintiff is entitled under the applicable  
22 United States laws and regulations or as this Court deems just and proper.  
23

24  
25 Dated: November 22, 2023

THE INTERNET LAW GROUP

26 By: /s David Newman

27 David Newman

28 Attorneys for Plaintiff ULRICH BOCKELMANN



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**JURY TRIAL DEMAND**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff demands trial by jury on all issues raised by this Complaint.

Dated: November 22, 2023

THE INTERNET LAW GROUP

By: */s David Newman*

David Newman

Attorneys for Plaintiff ULRICH BOCKELMANN